

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, INC.,

Plaintiff,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendant.

Civil Action No. 1:22-cv-10407-PBS

PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT

The plaintiff respectfully moves under Federal Rule of Civil Procedure 56 for entry of summary judgment on its claim that Immigration and Customs Enforcement (ICE) has violated the Freedom of Information Act (FOIA) by withholding responsive documents in response to the plaintiff's January 31, 2022 FOIA request. As described in the accompanying Memorandum of Law, ICE improperly withheld responsive records under FOIA Exemption 5 and 7(E) and should be compelled to produce the requested records without the challenged redactions.

Dated: December 22, 2022

Respectfully submitted,

/s/ Adriana Lafaille

Matthew R. Segal (BBO #654489)

Adriana Lafaille (BBO #680210)

Medha Swaminathan (Md. 2211290214)*

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*appearing *pro hac vice* with leave of Court

Local Rule 7.1 Certificate

I certify that I conferred with counsel for the defendant regarding this motion. The defendant opposes summary judgment for the plaintiff and has filed its own summary judgment motion, which the plaintiff opposes.

/s/ Adriana Lafaille
Adriana Lafaille